

Steven L. Beshear Governor

ENERGY AND ENVIRONMENT CABINET

Leonard K. Peters Secretary

Department for Environmental Protection Division of Waste Management
200 Fair Oaks Lane
Frankfort, Kentucky 40601-1190
www.kentucky.gov

MEMORANDUM

SUBJECT:

Evaluation of the Kenton County Airport Board's status under the RCRAInfo Corrective

Action Environmental Indicator Event Codes

CA400 and CA500

EPA I.D. Number: KYD 980-557-516 TEMPO Agency Interest Number: 197

TO:

April J. Webb, PE, Manager (S)

Hazardous Waste Branch

THROUGH:

Bart Schaffer, PG, Supervisor 645

Hazardous Waste Corrective Action Section

FROM:

Chris Jung, PG CY

Hazardous Waste Corrective Action Section

DATE:

September 30, 2010

I. PURPOSE OF MEMO

The purpose of this memo is to document the status of the Kenton County Airport Board in relation to the following corrective action event codes recently redefined in RCRAInfo data management system. The Kenton County Airport Board has successfully achieved the following for the *entire* facility.

- 1.) Remedy Decision Determination (CA400)
- 2.) Remedy Construction Determination (CA550)



Kenton County Airport Board will have a CA400 Yes and a CA550 YES entered into RCRAINFO for this date: September 30, 2010.

Concurrence by the Hazardous Waste Branch Manager is required prior to entering these event codes into RCRAInfo. Your concurrence with the interpretations provided in the following paragraphs and the subsequent recommendations is satisfied by initialing above.

II. REMEDY CONSTRUCTION DETERMINATION (CA550)

There are two (2) national status codes under CA550. These status codes are:

- 1) NR-No Remedy Constructed
- 2) RC-Remedy Constructed

Note that the two national status codes for CA550 are based on the entire facility (i.e., the codes are not SWMU specific). Therefore, every area at the facility must meet the definition before a NR or RC status code can be entered for CA550.

III. FACILITY BACKGROUND/CHRONOLOGY

The Kenton County Airport Board is located is located south of the Indiana-Ohio-Kentucky border junction near the city of Florence, Kentucky. The business offices are located at 2939 Terminal Drive, Hebron, Kentucky.

The airport operated as a Conditionally Exempt Generator (CEG). An RFA was completed on September 23, 2002. According to the RFA a total of 50 SWMUs and 2 AOCs were identified. Sampling was recommended for the following SWMUs & AOCs:

SWMU1A - Stationary Ranges

SWMU 1B - Skeet Range

SWMU 1 – Former Firing Range

SWMU 10A - Staging Area

SWMU 10 – Street Sweeping Area

SWMU 36B - Waste Oil Collection Drain and Underground Storage Tank (UST)

SWMU 46C - Waste Oil Tank

AOC A – Fumigation Area

SWMU 8A & 8B – Glycol Above Ground Storage Tanks (added after RFA)

Integrity testing was required for the following:

SWMU 31 – Glycol Pipeline System SWMU 32 – Storm Sewer System SWMU 36B – National Alamo Underground Piping

Documentation was required for the following:

AOC B – UST Removal Sites

Kenton County Airport Board was discovered as a non-notifier of hazardous waste in the eighties. The airport had been storing drums of F003 and F005 listed hazardous waste without the proper registration near a fire fighter burn pit. The airport used off-spec commercial grade fuel for the training exercise. The Division of Waste Management (DWM) issued a Notice of Violation (NOV) on February 10, 1989 for failure to submit a closure plan.

An Agreed Order was executed on September 19, 1990 and required the facility to identify all corrective action units; close the burn pit and storage area in accordance with 401 KAR 34:070; perform Corrective Action for remediation of groundwater and/or soil contamination; and groundwater monitoring.

IV. SUPPORT FOR CONCLUSION

Groundwater:

All wells evidenced concentrations below the MCL or below the method detection limit.

Soil:

Corrective action of the soils at the SWMUs and AOC identified in the RFA is complete. Impacted soils were removed and/or managed through the use of an environmental covenant. Contaminants of concern remain in the soils above residential Preliminary Remedial Goals (PRGs) for Total Petroleum Hydrocarbons (TPH) and Lead.

Document Review Summary:

Closure Report
RCRA Facility Assessment
Confirmatory Sampling Report
Interim Measures Report
Site Investigation Report
Confirmatory Sampling Report
Site Management Plan

June 17, 1999 March 12, 2002 July 16; 2004 February 22, 2005 April 26, 2005 August 27, 2007 September 17, 2010

V. CONCLUSION FOR REMEDY DECISION (CA400)

The appropriate status code to be entered for RCRAInfo event code CA400 (Remedy Decision) is YES. The site has an environmental covenant that restricts the land use to industrial.

CONCLUSION FOR REMEDY CONSTRUCTION (CA550)

The appropriate status code to be entered for RCRAInfo event code CA550 (Remedy Construction) is YES *RC- Remedy Constructed*. The site has an environmental covenant that restricts the land use to industrial.



ENERGY AND ENVIRONMENT CABINET

Steven L. Beshear Governor

Department for Environmental Protection
Division of Waste Management

200 Fair Oaks Lane Frankfort, Kentucky 40601-1190 www.kentucky.gov

September 30, 2010

SUBJ:

Evaluation of Kenton County Airport Board under the RCRA Info Corrective

Action Environmental Indicator Event Codes CA725 and CA750

EPA I.D. # KYD 980-557-516

AI # 197

TO:

April J. Webb, P.E., Manager

Hazardous Waste Branch

Division of Waste Management

THRU:

Bart Schaffer, P.G., Supervisor BCS

FROM:

Chris Jung, P.G.

I. PURPOSE OF MEMO

This memo is written to formalize an evaluation of the Kenton County Airport Board's status in relation to the following corrective action event codes defined in the Resource Conservation and Recovery Act Information System (RCRA Info):

- 1) Human Exposures Controlled Determination (CA725),
- 2) Groundwater Releases Controlled Determination (CA750).

The application of these event codes at the Kenton County Airport Board adheres to the event code definitions found in the Data Element Dictionary for RCRA Info.

Concurrence by the Hazardous Waste Branch Manager is required prior to entering these event codes into RCRA Info. Your concurrence with the interpretations provided in the following paragraphs and the subsequent recommendations is satisfied by dating and signing above.



Leonard K. Peters

Secretary

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

| racinty | Name: | Kenton County Airport Board | | | |
|-------------------|--------------------------------|--|--|--|--|
| Facility Address: | | 2939 Terminal Drive, Hebron, KY | | | |
| Facility | EPA ID#: | KYD 980-557-516 | | | |
| 1. | soil, groundw Solid Waste N | able relevant/significant information on known and reasonably suspected releases to vater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), red in this EI determination? | | | |
| | <u>X</u> If y | es - check here and continue with #2 below. | | | |
| 7 | If n | no - re-evaluate existing data, or | | | |
| | If d | lata are not available skip to #6 and enter "IN" (more information needed) status code. | | | |

BACKGROUND

Facilia. N

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" El determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

El Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

Current Human Exposures Under Control Environmental Indicator (EI) RCRIS code (CA725) Page 2

| 2. | "contaminated" above a | appropriately prot r appropriate stan | tective risk-b idards, guide | media known or reasonably suspected to be ased "levels" (applicable promulgated lines, guidance, or criteria) from releases Us or AOCs)? | | | | | |
|---------------------|--|--|---|--|--|--|--|--|--|
| | Groundwater Air (indoors) ² Surface Soil (e.g., <2 ft) Surface Water | Yes No X X X X X X X X X X X X X X X X X X | <u>?</u> | Rationale / Key Contaminants | | | | | |
| | Sediment Subsurf. Soil (e.g., >2 ft) Air (outdoors) | XX_ | | Lead and TPH | | | | | |
| citing | If no (fo | or all media) - ski | ip to #6, and | enter "YE," status code after providing or | | | | | |
| 3 | , appropr demons | riate "levels," and trating that these | l referencing "levels" are | sufficient supporting documentation not exceeded. | | | | | |
| | X If yes (for any media) - continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation. | | | | | | | | |
| Rationa | II unknown ale and Reference(s): | own (for any med | dia) - skip to | #6 and enter "IN" status code. | | | | | |
| concent the soil | ead slugs fired at the station inge. At the stationary rango trated in the eroded impact | nary ranges and fi es slugs were em zones directly be rms behind the ta | rom lead sho bedded in the hind the targ rgets contain | WMU1C) firing range stemmed from the stand asphaltic clay targets used at the e earthen backstop berm and were ets. Based upon information gathered during ed sufficient amounts of lead to exceed the | | | | | |
| Decem Record | The site was completely bac ber of 1994. Partial closure | kfilled and grade was documented to Support Partia | d in May 19 in the repor al Closure Ce | MU 3) were removed down to bedrock in 94. Partial clean closure was granted in titled Burn Pit and Drum Storage Area, prefication, February, 1995. Soils that soils. | | | | | |
| Suppor | ting Documentation: | | | | | | | | |
| RCRA | e Report Facility Assessment vestigation Report | t | | une 23, 1999 March 12, 2002 September 17, 2010 | | | | | |
| | | | | | | | | | |

Footnotes:

¹ "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPI, and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

² Recent evidence (from the Colorado Dept, of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

Current Human Exposures Under Control Environmental Indicator (EI) RCRIS code (CA725) Page 3

3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

| | Potential | <u>Human</u> | Receptor | <u>s</u> (Under Cur | rent Conditi | ons) | |
|--|--|---|---|--|--|---|--|
| Contaminated Media | Residents | Workers | Day-Care | Construction | Trespassers | Recreation | Food ' |
| Groundwater | | | | 50 to 100 ft 400 d | - | | - |
| Air (indoors) | | | | | | | 272.00 |
| Soil (surface, e.g., <2 ft) | 277.12 | | | | | | |
| Surface Water | ********** | | | | | | and the contraction of the contr |
| Sediment | 11-11- | | | | ********* | 166333 | |
| Soil (subsurface e.g., >2 ft) | N | N | N | N | Ν | N | N |
| Air (outdoors) | | - | | | | | and the second |
| Instructions for | Summary | Exposur | e Pathway | Evaluation * | lable: | | |
| Note: In order to focus the Media - Human Recepto combinations may not be added as necessary. X If no (property to #6, in-place each contains an alyzement of the second sec | uman Recorder combinate probable pathways and enter te, whethe ontaminate major page and page | eptor contion to the stions (Pastions to most are not converge start natural ed mediu athways). | most prol thways) di situations omplete fo itus code, or man-man (e.g., us | (Pathway). bable combin o not have ch they may be or any contam after explaini ade, preventing se optional Pa | ations some eck spaces (' possible in so inated media ng and/or re ng a complet athway Evalu | potential "Co ""). Whil ome settings a-receptor co ferencing cor fee exposure p uation Work | e these and should be mbination) -skip adition(s) athway from Sheet to |
| combi | nation) - c | ontinue a | ifter provi | ding supporti | ng explanati | | 2500 2000 2000 2000 2000 2000 2000 2000 |
| | nown (for ter "IN" s | | | d" Media - Hi | ıman Recept | or combinati | on) - skip to #6 |
| Rationale and Reference | (s): | | | | | | |
| The site has a v | egetated c | cover and | environm | ental covena | nt restricting | land use and | disturbance of |
| ³ Indirect Pathway/Receptor (e | .g., vegetabl | es, fruits, c | rops, meat a | nd dairy products | s, fish, shellfish | , etc.) | |

Current Human Exposures Under Control Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control Environmental Indicator (EI) RCRIS code (CA725) Page 4

| 4. be | Can the | e exposures from any of the complete pathways identified in #3 be reasonably expected to | | | | | |
|----------|---|---|--|--|--|--|--|
| 37 | "signifi | "significant"4(i.e., potentially "unacceptable" because exposures can be reasonably expected to be | | | | | |
| 1) | accepta magnitu | in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the ble "levels" (used to identify the "contamination"); or 2) the combination of exposure ade (perhaps even though low) and contaminant concentrations (which may be substantially the acceptable "levels") could result in greater than acceptable risks)? | | | | | |
| | | If no (exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) - skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant." | | | | | |
| | ***** | If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant." | | | | | |
| | 8 | If unknown (for any complete pathway) - skip to #6 and enter "IN" status code | | | | | |
| | Rationa | Rationale and Reference(s): | | | | | |
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⁴ If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

Current Human Exposures Under Control Environmental Indicator (EI) RCRIS code (CA725) Page 5

| 5. | Can the | e "significant" exposures (identified in #4) be shown to be within acceptable limits? If yes (all "significant" exposures have been shown to be within acceptable limits) - |
|----------------|-----------|---|
| continu | e | - Survey of the second shown to be within acceptable limits) |
| | | and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment). |
| | - | If no (there are current exposures that can be reasonably expected to be "unacceptable") – continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure. |
| | | If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code |
| Rationa | le and Re | eference(s): |
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Current Human Exposures Under Control Environmental Indicator (EI) RCRIS code (CA725)

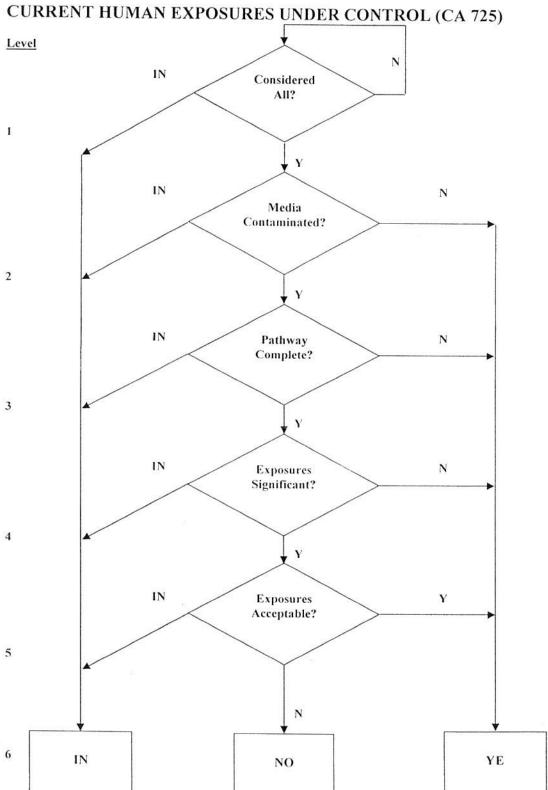
Page 6

| e d | Check the appropriate RCRIS status codes for the Current Human Exposures Under Control El event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the El determination below (and attach appropriate supporting documentation as well as a map of the facility): | | | | | | |
|-------------|---|--|--|--|--|--|--|
| _ | X YE - Yes, "Current Human Exposures Under Control" h review of the information contained in this EI Determina Exposures" are expected to be "Under Control" at the Ke facility, EPA ID #KYD 980-557-519, located at 2939 T under current and reasonably expected conditions. This determination will be re-evaluated when the Agenc significant changes at the facility. | ntion, "Current Human enton County Airport Board erminal Drive, Hebron, KY | | | | | |
| - | NO - "Current Human Exposures" are NOT "Under Con | | | | | | |
| _ | IN - More information is needed to make a determination | 1. | | | | | |
| Completed | | Date 9/30/10 | | | | | |
| | (print) Chris Junk (title) Registered Geologist | | | | | | |
| | (title) Registered Geologist | | | | | | |
| Supervisor | | Date9/30/10 | | | | | |
| | (print) Bart Schaffer | | | | | | |
| | (title) Geologist Registered Supervisor | | | | | | |
| | (EPA Region or State) KY | | | | | | |
| Locations | where References may be found: | | | | | | |
| K | entucky Division of Waste Management file room | Lead I in the series of experience of the series of the se | | | | | |
| | 00 Fair Oaks Lane | | | | | | |
| | rankfort, KY 40601 | | | | | | |
| | | | | | | | |
| Contact tel | ephone and e-mail numbers | | | | | | |
| (name) | Tina Fisher | | | | | | |
| (phone #) | 502-564-6716 | | | | | | |
| (e-mail) | Tina.fisher@ky.gov | | | | | | |

FINAL NOTE: THE HUMAN EXPOSURES ELLS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

Facility Name: Kenton County Airport Board EPA ID#: KYD 980-557-516

City/State: Hebron, KY



DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA750)

Migration of Contaminated Groundwater Under Control

| Facility | Name: | Kenton County Airport Board | | | | | |
|-------------------|-------------|--|--|--|--|--|--|
| Facility Address: | | 2939 Terminal Drive, Hebron, KY | | | | | |
| Facility | EPA ID#: | KYD 980-557-516 | | | | | |
| 1. | groundwater | able relevant/significant information on known and reasonably suspected releases to the media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units egulated Units (RU), and Areas of Concern (AOC)), been considered in this EI n? | | | | | |
| | If no | es - check here and continue with #2 below. o - re-evaluate existing data, or ata are not available, skip to #8 and enter "IN" (more information needed) status e. | | | | | |

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" El

A positive "Migration of Contaminated Groundwater Under Control" El determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of El Determinations

El Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

| 2. | "levels" (i.e., applicable promulgated standar | ted to be "contaminated" above appropriately protective ds, as well as other appropriate standards, guidelines, RCRA Corrective Action, anywhere at, or from, the | | | | | |
|----------------------------|--|---|--|--|--|--|--|
| | If yes - continue after identifying ke referencing supporting documentation | y contaminants, citing appropriate "levels," and on. | | | | | |
| | X If no - skip to #8 and enter "YE" star referencing supporting documentation "contaminated." | X If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated." | | | | | |
| | If unknown - skip to #8 and enter "II | N" status code. | | | | | |
| Ratio | ionale and Reference(s): | | | | | | |
| groun privat the sit | and around selected SWMUs and AOCs. Seve andwater quality at the site. Sampling events ever tate wells located in the vicinity of the site. There is the and monitoring well results indicate that sample | wells which were installed to determine groundwater eral sampling events were conducted to access the idenced concentrations below MCLs. There are no is a very low potential for exposure to groundwater at less are below MCLs or below detection limits. | | | | | |
| Suppo | porting Documentation: | | | | | | |
| | RA Facility Assessment | March 12, 2002 | | | | | |
| Confi | firmatory Sampling Report | July 16, 2004 | | | | | |
| Site Ir | Investigation Report | April 26, 2005 | | | | | |
| Confi | firmatory Sampling Report | August 27, 2007 | | | | | |
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Footnotes:

1"Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate "levels" (appropriate for the protection of the groundwater resource and its beneficial uses).

| 3. | expecte | e migration of contaminated groundwater stabilized (such that contaminated groundwater is ed to remain within "existing area of contaminated groundwater" as defined by the monitoring as designated at the time of this determination)? |
|----------|-------------|--|
| | | If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination" ²). |
| | | If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination" ²) - skip to #8 and enter "NO" status code, after providing an explanation. |
| | | If unknown - skip to #8 and enter "IN" status code. |
| Ration | ale and R | eference(s): |
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| been ve | erifiably o | f contaminated groundwater" is an area (with horizontal and vertical dimensions) that has demonstrated to contain all relevant groundwater contamination for this determination, |
| and is o | defined by | v designated (monitoring) locations proximate to the outer perimeter of "contamination" |

²"existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

| 4. | Does " | contaminated" groundwater discharge into surface water bodies? |
|--------------|-----------|---|
| | | If yes - continue after identifying potentially affected surface water bodies. |
| | | If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies. |
| | | If unknown - skip to #8 and enter "IN" status code. |
| Ration | ale and R | eference(s): |
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Page 5

| Is the discharge of "contaminated" groundwater into surface water likely to be "insignificant" the maximum concentration of each contaminant discharging into surface water is less than 10 their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and nur of discharging contaminants, or environmental setting), which significantly increase the potential unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)? | imes mber, |
|---|---------------|
| If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration ³ of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system. | |
| If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration ³ of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations ³ greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing. | * |
| If unknown - enter "IN" status code in #8. | |
| Rationale and Reference(s): | - |
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³As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

Page 6

| 5. | accepta | able" (i.e., not cause impacts to surface water, sediments or eco-systems that should not be do continue until a final remedy decision can be made and implemented ⁴)? |
|---------------|-----------------------|---|
| | | If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR 2) providing or referencing an interim-assessment, appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the El determination. If no - (the discharge of "contaminated" groundwater can not be shown to be "currently" |
| | | acceptable") - skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems. |
| | | If unknown - skip to 8 and enter "IN" status code. |
| Rationa | le and R | eference(s): |
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| for man | y species liminate | reas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) s, appropriate specialist (e.g., ecologist) should be included in management decisions that these areas by significantly altering or reversing groundwater flow pathways near surface |
| rapidly | developi | ing of the impacts of contaminated groundwater discharges into surface water bodies is a ng field and reviewers are encouraged to look to the latest guidance for the appropriate le of demonstration to be reasonably certain that discharges are not causing currently |

unacceptable impacts to the surface waters, sediments or eco-systems.

| | groundwater contamination will not be migrating horizontally (or vertically, as | | |
|---|---|--|--|
| If unknown - enter "IN" status code in #8. Rationale and Reference(s): | | | |
| Rationale and Reference(s): | | | |
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Page 8

| 8. C | Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility). X YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the the Kenton County Airport Board facility, EPA ID #KYD 980-557-516, located at 2939 Terminal Drive, Hebron. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility. NO - Unacceptable migration of contaminated groundwater is observed or expected. | | |
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| th | | | |
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| - | IN - More information is needed to make a determination | 1. | |
| Completed | by (signature) (print) Chris Jung (title) Registered Geologist | Date9/30/10 | |
| Supervisor | | Date9/30/10 | |
| Locations v | where References may be found: | | |
| K | entucky Division of Waste Management file room 00 Fair Oaks Lane | | |
| | rankfort, KY 40601 | | |
| (name) | ephone and e-mail numbers Tina Fisher | | |
| (phone #)_ | | | |
| (e-mail) | Tina.fisher@ky.gov | | |

FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

Facility Name: Blue Grass Airport
EPA ID#: KYD 096-552-161
City/State: Lexington, KY

MIGRATION OF CONTAMINATED GROUNDWATER UNDER CONTROL (CA 750)

